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PUC DOCKET NO. 49737

APPLICATION OF SOUTHWESTERN \$ 2019 JUL 17 PM 3: 38

CERTIFICATE OF CONVENIENCE \$ PUBLIC UTILITY COMMISSION AND NECESSITY AUTHORIZATION \$ OF TEXAS ACQUISITION OF WIND \$ GENERATION FACILITIES

OFFICE OF PUBLIC UTILITY COUNSEL'S MOTION TO INTERVENE

Pursuant to Texas Utilities Code §§ 13.001 and 13.003(a)(3)(A)-(B), and 16 Texas Administrative Code § 22.103(b), the Office of Public Utility Counsel ("OPUC") moves to intervene in this proceeding as a matter of right on behalf of the residential and small commercial consumers in Southwestern Electric Power Company's ("SWEPCO") service territory. The OPUC's Chief Executive and Public Counsel has determined that residential and small commercial consumers in SWEPCO's service territory are in need of representation in this proceeding. Therefore, OPUC has standing to participate in this proceeding that is expressly conferred by statute.



Dated: July 17, 2019

Respectfully submitted,

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Assistant Public Counsel

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ATTORNEYS FOR THE OFFICE OF PUBLIC UTILITY COUNSEL

CERTIFICATE OF SERVICE

PUC DOCKET NO. 49737

I hereby certify that a copy of the foregoing document was served on all parties of record in this proceeding on this 17th day of July 2019 by facsimile, electronic mail, and/or first class, U.S. Mail.

Cassandra Ouinn